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*Attorneys for Plaintiff*  
*Gallagher-Kaiser Corporation*

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

GALLAGHER-KAISER CORPORATION, a  
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited  
liability company; BIO SHIELD TECH, LLC,  
a foreign limited liability company;  
HARTFORD CASUALTY INSURANCE  
COMPANY, an Indiana insurance corporation;  
NGM INSURANCE COMPANY, a Florida  
corporation; and DOES 1-10 Insurance  
Company(ies), inclusive,

Defendants.

CASE NO. : 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST FOR  
ORDER EXTENDING PLAINTIFF  
GALLAGHER-KAISER  
CORPORATION'S TIME TO RESPOND  
TO DEFENDANTS HARTFORD  
CASUALTY INSURANCE COMPANY'S  
AND NGM INSURANCE COMPANY'S  
MOTION FOR SUMMARY JUDGMENT**

Plaintiff, GALLAGHER-KAISER CORPORATION ("GK"), by and through its attorneys  
of record, the law firm of PEEL BRIMLEY LLP, and Defendants, HARTFORD CASUALTY  
INSURANCE COMPANY ("Hartford") by and through its attorneys of record, the law firm of  
McCLOSKEY, WARING & DRURY LLP and Defendants, NGM INSURANCE COMPANY  
("NGM"), by and through its attorneys of record, the law firm of BARRETT & MATURA, P.C.,  
hereby stipulate and agree as follows:

**WHEREAS**, Hartford filed its Motion for Summary Judgment on May 15, 2025 (the  
"Hartford Motion");

**WHEREAS**, NGM filed its Motion for Partial Summary Judgment on May 15, 2025 (the  
"NGM Motion");

1           **WHEREAS**, the original deadline for GK to file its Responses (the “Responses”) to both  
2 the Hartford Motion and the NGM Motion (collectively, the “Motions”) is June 5, 2025;

3           **WHEREAS**, due to scheduling conflicts, GK requested and received from Hartford’s  
4 counsel and NGM’s counsel an additional thirty (30) days to file its Responses to the Motions;

5           **THEREFORE**, the parties agree and stipulate that GK shall have up to and including  
6 Monday, July 7, 2025 to file its Responses to the Motions.

7           **IT IS SO STIPULATED.**

8           Dated this 4th day of June, 2025.

9           **PEEL BRIMLEY LLP**

**McCLOSKEY, WARING & DRURY LLP**

10           */s/ Cary Domina*

*/s/ Andrew R. McCloskey*

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26 *Attorney for Hartford Casualty Insurance*  
27 *Company*

17           **BARRETT & MATURA, P.C.**

18           */s/ Kevin C. Barrett*

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26 *Attorney for NGM Insurance Company*

24           **IT IS SO ORDERED.**

25           Dated this 6 day of June, 2025.

26           \_\_\_\_\_  
27 Gloria M. Navarro  
28 US DISTRICT COURT JUDGE

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